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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LISA VIZCARRA, individually, and on
behalf of those similarly situated,

Plaintiff,

v.

UNILEVER UNITED STATES, INC.,

Defendant.

Case No. 4:20-CV-02777-YGR

**PARTIES' STATEMENT ON
PROGRESS OF SETTLEMENT
NEGOTIATIONS AND REQUEST
FOR EXTENSION OF STAY**

Assigned to Hon. Yvonne Gonzalez
Rogers

Pursuant to the Joint Stipulation and Order entered November 15, 2023,
counsel for Plaintiff Lisa Vizcarra and the class, and counsel for Defendant
Unilever United States, Inc. ("Unilever") (collectively the "Parties"), herein report
to the Court on the status of settlement negotiations and request a 60-day extension

1 of the current stay of this case so that the parties may continue to seek resolution.

2 WHEREAS, the Parties have conducted settlement negotiations
3 continuously and in good faith since the entry of the current stay on November 15,
4 2023. On January 17, 2024, the Parties participated in a videoconference
5 mediation session before mediator Peter J. Woodin, of JAMS, at which significant
6 progress was made in narrowing the points of dispute and moving toward
7 convergence on those terms.

8 WHEREAS, in the weeks since that session, the parties have continued to
9 negotiate by telephone and electronic mail, and have made further settlement
10 progress, including tentative agreement on some key terms. The Parties are
11 hopeful that continued discussions may result in a resolution of this matter.

12 NOW, THEREFORE, in view of the above, the Parties stipulate and
13 respectfully request that the Court extend the current stay of this case and continue
14 the hearing currently scheduled for February 23, 2024, for a further 60 days, to
15 permit the Parties to continue progressing toward settlement. The Parties would
16 submit a further report on settlement progress on April 16, 2024, and the hearing
17 would be continued to April 23, 2024, or such date as suits the Court's
18 convenience.
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1 Dated: February 15, 2024

Respectfully submitted,

2 /s/ Sue J. Nam

/s/ August T. Horvath

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14 *Counsel for Plaintiff and*

15 *Certified Class*

ATTORNEY ATTESTATION

I, August T. Horvath, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3), that the concurrence to the filing of this document has been obtained from opposing counsel Sue J. Nam.

Dated: February 15, 2024

FOLEY HOAG LLP

/s/ August T. Horvath
August T. Horvath (*pro hac vice*)

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

The case is stayed.

No later than April 16, 2024, the parties shall file a joint statement updating the Court on the outcome of their settlement discussions and proposing a new case schedule if the Parties fail to enter into a settlement agreement.

A compliance hearing is set for April __, 2024, at _____ [a.m./p.m.], which will be vacated if the Parties file the joint statement above.

IT IS SO ORDERED.

Dated: _____, 2024

HONORABLE YVONNE GONZALES ROGERS
United States District Judge